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PGH-94-MJD-718

August 15, 1994

Mr. Dion Novak
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
HSRL-6J
Chicago, Illinois 60604

Subject: Enviro-Chem Superfund Site
Monthly Progress Report No. 12
July 9, 1994 through August 12, 1994

Dear Mr. Novak:

Enclosed is the subject progress report. A copy of the report has been submitted to Mr. Jim Smith at IDEM.

Sincerely,

Mark J. Dowiak
Project Manager

MJD/rks

Attachment

cc: Mr. Roy O. Ball - ERM-North Central
Mr. Norman Bernstein - Bernstein & Associates
Mr. John Kyle - Barnes & Thornburg



Memorandum

TO: James R. Smith, Ph.D., IDEM
Dion Novak, U.S. EPA

DATE: August 15, 1994

FROM: Mark J. Dowiak, P.E., Project Manager

COPIES: Roy O. Ball, Ph.D. - ERM-North Central
Norman Bernstein, Esq. - Bernstein & Associates
John Kyle, Esq. - Barnes & Thornburg

SUBJECT: Enviro-Chem Superfund Site
Monthly Progress Report Number 12
July 9, 1994 through August 12, 1994

This Monthly Progress Report has been prepared in accordance with Section XII of the Consent Decree entered September 10, 1991, Number 83-1419 C, U.S.D.C. District of Indiana.

Activities

On July 12, 1994, Quality Environmental Management Inc., (QEM) conducted the July 1994 site inspection. A portion of the security fence near the southwest gate was found to be damaged, apparently as a result of activities in the adjacent Parcel 45. The Parcel 45 diversion channel culvert at the northwest gate was clogged with debris and soil, which causes water to backup in the channel. The Parcel 45 south diversion channel and the Support Zone diversion channels remain open and functional. The Trustees plan to have a subcontractor perform the necessary repairs to the security fence and cleanup the diversion channel debris. This work is planned for September/October 1994.

In a July 13, 1994 letter to Mark Dowiak, U.S. EPA provided their comments on the Draft Work Plan for the Drum Inventory, June 19, 1994.

The Draft Field Sampling Plan, Revision 2, for the Support Zone Investigations was submitted to U.S. EPA on July 14, 1994. Supporting rationale for this plan was supplied in the Trustees' July 8, 1994 letter to Karen Vendl on this and the "nine additional compounds" topic.

In a July 22, 1994 letter to U.S. EPA, Mark Dowiak presented the Trustees' position regarding the "nine additional compounds" referred to in U.S. EPA's March 9, 1994 letter to Roy Ball, and subsequent May 20, 1994 letter to Mark Dowiak. The Trustees agreed that five volatile organic compounds (VOC's) and their acceptable concentrations could be added to Table 3-1 of

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the Consent Decree, Exhibit A. The Trustees did not agree to add three semi-volatile organic compounds (SVOC's) to Table 3-1 for the reasons described in the July 22, 1994 letter referenced above. Chloroethane was proposed to be excluded from Table 3-1 since acceptable concentrations cannot be estimated because of the lack of reference toxicity data.

On July 29, 1994, AWD Technologies, Inc. (AWD) submitted a Draft Preliminary Design (30 percent) and Draft Evaluation of Alternatives Memorandum to U.S. EPA for the Revised Remedial Action. The Preliminary Design built upon the presentation made to U.S. EPA, CH2MHill, and IDEM on June 17, 1994.

In a July 29, 1994, letter to Mark Dowiak, U.S. EPA responded to the July 22 Trustee letter concerning the "nine additional compounds". U.S. EPA accepted the Trustees position to add the five VOC's, however, U.S. EPA was not in complete agreement with the Trustees position on the three SVOC's. U.S. EPA proposed to add the three SVOC's to the Table 3-1 acceptable concentrations for subsurface and stream water. Additional discussions will be necessary on this topic.

In an August 3, 1994 letter to Mark Dowiak, U.S. EPA responded to the Draft Field Sampling Plan (FSP) for the Support Zone Investigations, submitted on July 14. U.S. EPA indicated that the FSP was unacceptable since the plan did not focus on defining the western Remedial Boundary of the site. Formal comments were not provided. U.S. EPA suggested that a meeting be held with the Trustees to hopefully resolve the SZI issues. The Trustees agree that a meeting is in order.

On August 3, 1994, QEM conducted the August 1994 site inspection. Conditions were found to be similar to the July 1994 inspection. The security fence has not been further damaged and the Parcel 45 north diversion channel culvert continues to be clogged. The Trustees will initiate maintenance actions as previously described.

On August 10, Mark Dowiak submitted a letter to U.S. EPA which contained responses to the comments on the Draft Drum Inventory Work Plan.

Activities to be Conducted from August 13 through September 14, 1994

A site inspection will be conducted by QEM during the first week of September 1994.

The Trustees will send U.S. EPA a letter regarding the three SVOC's during the week of August 15, 1994.

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The Trustees hope to receive U.S. EPA approval of the Draft Drum Inventory Work Plan comment responses so that a final Work Plan can be prepared and the drum inventory work can be scheduled.

The Trustees intend to meet in September with U.S. EPA, and U.S. EPA's new project manager, Dion Novak, to discuss the status of the site in general, the drum inventory work plan, U.S. EPA's preliminary reactions to the Preliminary Design (30 percent), the "nine new compounds" and the Support Zone Investigations. A meeting date has not been scheduled.

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